From: Garyg Miller
To: Rafael Casanova
Cc: Dipanjana Bhattacharya
Subject: Re: Gulfco Language
Date: 09/14/2011 08:21 AM

A few edits - see below.

Thanks,

Gary Miller, P.E.
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▼ Rafael Casanova---09/13/2011 05:02:53 PM---Gary, Dipanjana, please review the following highlighted language and provide any comments so that I

From: Rafael Casanova/R6/USEPA/US
To: Garyg Miller/R6/USEPA/US@EPA, Dipanjana Bhattacharya/R6/USEPA/US@EPA
Date: 09/13/2011 05:02 PM
Subject: Gulfco Language

Gary, Dipanjana, please review the following highlighted language and provide any comments so that I can modify the "cap" portions of the ROD with this language. Dipanjana, I incuded this language in the following section of the ROD, where else could we put it in the risk assessment portion of the ROD.

14.1.8.3 Contact Recreation Scenario

Exposure to sediment and surface water by the youth trespasser and contact recreation receptor were evaluated using TCEQ's contact recreation PCLs for these media. None of the PCOCs detected in these media exceeded their respective PCLs (see Tables 4, 5, 6, 7, 11, 12, 13, and 14). As such, exposure to PCOCs in these media is unlikely to result in an adverse health risk.

~~It is likely that~~ Zone A ground water intersects the Intracoastal Waterway in areas adjacent to the Site. In the areas where this intersection occurs, the ground water/surface water discharge relationship ~~likely~~ shows both short- and long-term variations depending on Zone A potentiometric levels and the tidal stage of the waterway. Regardless of the specific recharge/discharge condition at a given point in time, the net flux between Zone A and the Intracoastal Waterway is likely to be relatively low given: (1) the low hydraulic conductivity of Zone A, (2) the limited thickness of the unit adjacent to the shoreline, and (3) the relatively low magnitude of tidal range fluctuations within the waterway.

Impacted ground water from the North Area of the Site does not

discharge to the surface water and sediments of the Intracoastal Waterway; however, ~~an overly conservative~~ a qualitative assessment determined that the undiluted total concentrations of ground water COIs, should discharge into the waterway occur, could pose a risk to contact recreation receptors. The existing cap over the former impoundments currently limits water infiltration into Zone A, and therefore limits a driving force for plume migration. However, if the cap is not be maintained in the future, infiltration will increase and likely result in accelerated plume migration, which may eventually reach the Intracoastal Waterway in the future. A maximum reported concentration for Zone A ground water of 292.0 mg/L for 1,2-DCA is more than three (3) orders of magnitude higher than the TRRP PCL of 0.196 mg/L. A maximum reported concentration for Zone A ground water of 234.0 mg/L for 1,1,1-TCA is almost five (5) times higher than the TRRP PCL of 47.2 mg/L. Therefore, the cap, and its maintenance, are an important part of the selected remedy.

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Assigned Sites for Investigation and Remediation:
(http://www.epa.gov/earth1r6/6sf/6sf-tx.htm):
Brine Service Company Superfund Site (Corpus Christi, Texas)
Donna Reservoir and Canal Superfund Site (Donna, Texas)
Falcon Refinery Superfund Site (Ingleside, Texas)
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)
Palmer Barge Line Superfund Site (Port Arthur, Texas)
State Marine of Port Arthur Superfund Site (Port Arthur, Texas)